

abuse cases.

23. A class action is superior to other alternative methods of adjudicating this dispute. Individual cases are not economically feasible. Many debtors may not realize that their rights are violated.

**WHEREFORE**, the Court should enter judgment in favor of plaintiff and the class members and against the defendant for:

- (1) Statutory damages;
- (2) Attorney's fees, litigation expenses and costs of suit;
- (3) Such other and further relief as the Court deems proper.

DEMAND FOR TRIAL BY JURY

Plaintiff requests trial by jury on all issues so triable.

Dated: New York, New York  
October 27, 2010

THE PLAINTIFF

By: 

Shimshon Wexler (SW-0770)

The Law Offices of Shimshon Wexler, P.C.  
2664 Broadway  
New York, NY 10025  
(212) 760-2400  
swexler@collectorabuselaw.com

# EXHIBIT A

NATIONWIDE CREDIT, INC.  
2015 VAUGHN RD, BLDG 400, KENNESAW GA-30144.  
(877) 383-4576

10/07/2010

RE: AMERICAN EXPRESS TRAVEL RELATED SE # 377263057072000  
BAL. \$ 470.32

We are writing to confirm the settlement offer that we made to you on behalf of American Express. We and American Express Travel Related Services Company, Inc. agree to settle your account for \$ 150.00

On or before,

01. Date: 10/07/2010 (MM/DD/YYYY) Amount: \$150.00

Please make your check payable to American Express Related SE and send it to us in time for it to arrive as per the above dates. After the due date this offer will no longer apply and we will request the full balance immediately.

If you have any questions about this matter, call our toll free at (877) 383-4576

Accepting this offer will end your obligation for the debt, at a substantial cost savings compared to your account balance.

The total account balance as of the date of this letter is shown above. Your account balance may increase due to interest or other charges, if so provided in your agreement with your creditor.

PO BOX 740640  
ATLANTA, GA 30374

ID NUMBER: 10251110374  
ACCOUNT NO: 377263057072000  
BALANCE DUE: \$ 470.32

RE: AMERICAN EXPRESS TRAVEL RELATED SE  
02136501D

10251110374  
HERSKOVITZ, JOEL

2 KROLLA DR UNIT 301  
MONROE  
NY 10950.

NATIONWIDE CREDIT, INC  
PO BOX 26314  
LEHIGH VALLEY, PA 18002